

Virtual rate centers are utilized by **CMRS** carriers to associate a wireless telephone number with a wireline rate center, even though that rate center may be different from the location where the ILEC delivers the call to the CMRS provider (the mobile gateway). Depending on the distance between a LEC tandem and end office, there are many instances where the tandem and the end office are located in different rate centers such that a call from the LEC end office to the LEC tandem would be rated as a toll call for a LEC end user. Because of the large geographic areas covered by most CMRS licensees, however, a wireless carrier can offer service to customers in the areas served by both the LEC end office and the tandem where the two carriers interconnect. Thus, the CMRS provider must be permitted to obtain telephone numbers in all areas within its local calling area (the MTA) to permit its subscribers to receive calls from wireline users that are rated to the wireline customer as local calls.⁹⁵

The continued availability of virtual NXXs is critical to promoting CMRS competition and ensuring efficient network development. Virtual NXXs create a local calling area similar to the incumbents, thus avoiding customer confusion. In addition, they permit wireless carriers to assign wireless customers numbers that associate customers with a particular geography for all incoming calls without requiring the wireless carrier to duplicate the wireline network. Virtual rate centers are also important in promoting the efficient use of numbering resources. Without virtual NXXs, a CMRS provider would be required to obtain an entire 10,000 block of numbers (or 1,000 block if number pooling has been implemented) in every rate center where it offers

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This highlights a difference between flexible rating and reverse toll billing. Reverse toll billing is a service that wireless carriers have sometimes purchased from LECs whereby the wireless carrier will assume the toll charges associated with land-to-mobile calls in certain broad geographic areas.

service. Virtual rate centers thus permit CMRS carriers to 1) utilize rating mechanisms that satisfy their customers' needs, 2) construct efficient network architectures, which in the case of LEC-CMRS interconnection is through the tandem, and 3) use telephone numbering resources efficiently.

Based on the mobile nature of wireless service, the Commission should find that CMRS providers should not be required to establish facilities in each rate center where their customers wish to maintain "local service" (a term based on ILEC network architecture). To the extent CMRS is ever going to compete with wireline service, it will not be able to do so if a wireline customer must pay a toll charge to reach the wireless customer when the wireless customer may live a few blocks away (or even in the same location). Access to virtual rate centers should not affect the Commission's decision to adopt bill and keep for LEC-CMRS interconnection.

Whether a CMRS provider has entered into a flexible rating arrangement to permit virtual NXXs is irrelevant for land to mobile traffic, because with or without such a mechanism, the LEC would be responsible for recovery of its costs to transport traffic from the end office to the tandem.

VII. CONCLUSION

For all the above-stated reasons, CTIA respectfully urges the Commission to move promptly to a bill and keep regime for LEC-CMRS interconnection.

Respectfully submitted,

**CELLULAR TELECOMMUNICATIONS
& INTERNET ASSOCIATION**



Michael F. Altschul
Senior Vice President, General Counsel

WILLKIE FARR & GALLAGHER

Three Lafayette Centre
1150 21st Street, NW
Suite 600
Washington, D.C. 20036
(202) 328-8000

Its Attorneys

1250 Connecticut Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 785-0081

August 21, 2001